

Exhibit A

COPY

FEB 23 2017



MICHAEL K. JEANES, CLERK
A. VALENZUELA
DEPUTY CLERK

COPY

In association with

Robert K. Lewis, State Bar No. 016625
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Attorneys for Plaintiffs

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Fax: (602) 252-1447
amy@lewisandpokora.com
Attorney for Plaintiffs

SUPERIOR COURT OF ARIZONA

COUNTY OF MARICOPA

JESSICA GAUDET, HEIDI GAUDET and
MELISSA GAUDET, individually, as
surviving beneficiaries of Bruce Gaudet,

Plaintiffs,

vs.

ELECTRIC INSURANCE COMPANY, a
Massachusetts company; JOHN and JANE
DOES I through X, fictitious individuals;
ABC CORPORATIONS I-X, MUNICIPAL
CORPORATIONS I-X; XYZ
PARTNERSHIPS, SOLE
PROPRIETORSHIPS and/or JOINT
VENTURES I-X, fictitious entities,

Defendants.

Case No. CV 2017-000283

COMPLAINT

Plaintiffs Jessica Gaudet, Heidi Gaudet and Melissa Gaudet, by and through counsel
undersigned, allege as follows:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Jessica Gaudet is the surviving daughter of Bruce Gaudet and is a
resident of Clark County, Nevada.

1 2. Plaintiff Heidi Gaudet is the surviving daughter of Bruce Gaudet and is a
2 resident of Clark County, Nevada.

3 3. Plaintiff Melissa Gaudet is the surviving daughter of Bruce Gaudet and is a
4 resident of Clark County, Nevada.

5 4. Plaintiffs Jessica Gaudet, Heidi Gaudet and Melissa Gaudet are collectively
6 referred to as the "Gaudets".

7 5. Defendant Electric Insurance Company ("Electric") is a Massachusetts
8 company licensed to do business and doing business in the State of Arizona.

9 6. Defendant Electric is responsible for the acts of its employees, agents,
10 subcontractors, and representatives including, its attorneys.

11 7. Defendant Electric is responsible for its agent corporate entities, subdivisions,
12 sub-corporations, companies, agents and representatives.

13 8. The deceased, Bruce Gaudet, was a resident of Maricopa County, Arizona.

14 9. Defendants John and Jane Does I through V, ABC Corporations I-X, XYZ
15 Partnerships, Sole Proprietorships and/or Joint Ventures I-X are corporations, business entities,
16 persons, agents, servants or employees whose true names are not now known to Plaintiffs
17 Gaudet. To the extent of discovery to be conducted, Plaintiffs allege that John and Jane Does I
18 through V, ABC Corporations I-X, XYZ Partnerships, Sole Proprietorships and/or Joint
19 Ventures I-X are residents of the county of Maricopa, State of Arizona, and that they caused
20 events to occur in the State of Arizona out of which Plaintiffs' cause of action arose. Plaintiffs
21 request leave of Court to amend the complaint once the true identities of these fictitious
22 defendants become known to them.

23 10. Defendants caused events to occur in Maricopa County out of which this action
24 arises.
25
26

1 11. Jurisdiction and venue are proper in Maricopa County, Arizona.

2 12. The amount in controversy exceeds the jurisdictional limits of this Court.

3 **GENERAL ALLEGATIONS**

4 13. Plaintiff incorporates paragraphs 1-12 as though fully set forth herein.

5 14. On January 26, 2012, Bruce Gaudet, the father of Jessica Gaudet, Heidi Gaudet
6 and Melissa Gaudet, was killed as a result of Michael Crane's actions.

7 15. Bruce Gaudet was found dead inside his Phoenix condominium.

8 16. Bruce Gaudet was shot and his condo was set on fire.

9 17. Michael Crane was charged with the death of Bruce Gaudet.

10 18. At all times relevant herein, Defendant Michael Crane was a resident at 2539 E.
11 Larkspur in Phoenix, Arizona.

12 19. On March 14, 2013, Heidi Gaudet, Melissa Gaudet, and Jessica Gaudet filed a
13 Complaint against Michael Crane in a Maricopa County Superior Court for negligence and
14 assault and battery, cause number CV2013-002533, entitled *Gaudet v. Crane*.

15 20. Plaintiffs sought damages including, but not limited to, those under A.R.S. §
16 12-612, § 12-613.

17 21. Electric did not provide a defense for Crane in the lawsuit entitled *Gaudet v.*
18 *Crane*.

19 22. Electric did not provide indemnity for Crane in relation to the lawsuit entitled
20 *Gaudet v. Crane*.

21 23. Crane did not file an Answer or other responsive pleading.

22 24. On May 7, 2013, the Gaudets sent a letter to Electric requesting the payment of
23 the homeowner's insurance liability policy limit.
24
25
26

1 25. At no time did Electric pay the Homeowner's insurance liability policy limit on
2 behalf of Crane.

3 26. Electric did not respond to the Gaudets' request for the homeowner's liability
4 policy limit.

5 27. On January 8, 2014, Electric moved to intervene in to the lawsuit *Gaudet v.*
6 *Crane*.

7 28. On February 21, 2014, the Court denied Electric's Motion to Intervene filed in
8 *Gaudet v. Crane*.

9 29. On November 21, 2014, Electric filed a Temporary Restraining Order and
10 Preliminary Injunction without Notice and a Second Motion to Intervene in *Gaudet v. Crane*.

11 30. Electric sought to prevent Crane from entering into an assignment of Crane's
12 rights against Electric to the Gaudets.

13 31. Electric undertook efforts to stop Crane from protecting himself in lawsuit
14 *Gaudet v. Crane*.

15 32. On November 24, 2014, the Court denied Electric's application for a
16 Temporary Restraining Order.

17 33. On December 2, 2014, the Gaudets filed an Application for Default Judgement.

18 34. A default hearing was held on February 19, 2015.

19 35. On February 25, 2015, the Honorable Katherine Cooper, a Judge of the
20 Maricopa County Superior Court, issued three separate Judgments in favor of the Heidi
21 Gaudet, Melissa Gaudet and Jessica Gaudet, and against Crane for TEN MILLION
22 DOLLARS (\$10,000,000) each, for a total of THIRTY MILLION DOLLARS (\$30,000,000).
23

24 36. Jessica Gaudet was awarded judgment in her favor and against Crane for ten
25 million dollars (\$10,000,000.00)
26

1 37. Mellissa Gaudet was awarded judgment in her favor and against Crane for ten
2 million dollars (\$10,000,000.00)

3 38. Heidi Gaudet was awarded judgment in her favor and against Crane for ten
4 million dollars (\$10,000,000.00)

5 39. The Judgments were issued by a Maricopa County Superior Court after a
6 hearing.

7 40. The Judgments are for a reasonable amount.

8 41. On September 28, 2015, all three Judgments were recorded against Crane with
9 the Maricopa County Recorder's Office.

10 42. All three judgments are executable against Crane and his personal assets.

11 43. Electric did not pay the policy limit.

12 44. Electric did not protect its insured.

13 45. Electric left Crane to protect himself.

14 46. Crane was left on his own to defend himself against the Gaudets' Complaint.

15 47. Crane did not defend himself against the Gaudets' Complaint.

16 48. Without the help of Electric, Crane was unable to defend himself.

17 49. On May 6, 2014, the Gaudets filed a Petition for Appointment of a Special
18 Conservator Pursuant to A.R.S. §14-5401(A)(2)(a) and §14-5409 in a Maricopa County
19 Superior Court, cause number PB2014-002181, entitled In Re Matter of Special
20 Conservatorship of Michael Lee Crane.

21 50. On October 28, 2014, Kurt Hammond, Esq. was appointed as Special
22 Conservator for Crane to identify the property that will be wasted or dissipated unless proper
23 management is provided and to review and sign all documents and/or agreements to
24
25
26

1 effectuate the assignment of Crane's claim against his insurance company, Electric Insurance
2 Company, to the Gaudets.

3 51. On November 26, 2014, Electric moved to intervene into the probate matter.
4

5 52. Electric sought to stop Crane and/or his Special Conservator from entering into
6 an Assignment.

7 53. On November 26, 2014, Electric filed for a Temporary Restraining Order.

8 54. Electric sought to restrain the Special Conservator from executing a settlement
9 agreement on behalf of Crane assigning Crane's rights against Electric to the Gaudets.

10 55. On December 15, 2014, the Court in PB2014-002181 denied Electric's Motion
11 to Intervene and found that its Application for a Temporary Restraining Order is moot.

12 56. The Gaudets entered into a Covenant Not To Execute and Assignment
13 ("Assignment") with Crane, via his court-appointed Special Conservator.

14 57. Pursuant to the Assignment, the Gaudets agree not to execute the Judgments in
15 the amount of \$30,000,000 upon Crane personally or against his personal assets and Crane,
16 via his court-appointed Special Conservator agreed, to assign to the Gaudets all claims and
17 causes of action that Crane has against Electric.

18 58. Pursuant to the Assignment, causes of action against Electric were assigned to
19 the Gaudets.

20 59.

21 **COUNT ONE**
22 **(Breach of Contract)**

23 60. Plaintiffs incorporate all prior paragraphs as fully set forth herein.

24 61. The homeowner's insurance policy constitutes a contract of insurance between
25 the Crane and Electric.
26

1 62. Under the insurance policy contract Electric was required to provide a defense to
2 Crane.

3 63. Under the insurance policy contract, Electric was required to make indemnity
4 payments on behalf of Crane.

5 64. Electric's failure to defend Crane constitutes a material breach of the insurance
6 policy.

7 65. Electric's failure to provide indemnity for Crane constitutes a material breach of
8 the insurance policy.

9 66. Electric's failure to settle the claims against Crane constitutes a material breach
10 of the insurance policy.

11 67. As a direct and proximate result of Electric's breach of contract, Plaintiffs
12 sustained, and will continue to sustain damages in amounts to be proven at trial.

13 68. As a direct and proximate result of Electric's breach of contract, Plaintiffs
14 sustained and will continue to sustain reasonably foreseeable consequential damages in an
15 amount to be proven at trial.

16 69. Because this matter arises of our contract, Plaintiffs are entitled to an award of
17 their attorney's fees incurred herein pursuant to the A.R.S. 12-341.01.

18 **COUNT TWO**
19 **(Bad faith)**

20 70. Plaintiffs incorporate all prior paragraphs as fully set forth herein.

21 71. Electric issued a policy of insurance constituting a contract which ensured that
22 Crane was entitled to receive liability coverage under the policy.

23 72. Electric is responsible for the acts and omissions of its agents, representatives and
24 employees, including, its lawyers.
25
26

1 73. Electric acted in bad faith by failing to provide coverage and indemnity and
2 defend Crane as provided for in the policy.

3 74. Electric's failure to provide coverage and indemnity and defend Crane acted to
4 destroy the very security of the policy purchased.

5 75. Electric and/or its lawyers acted with an evil mind in that it knew or should have
6 known that the coverage determination was flawed.

7 76. Electric acted in bad faith and breached its implied covenant of good faith and
8 fair dealing and breached its independent promise to adjust the claim consistent with the
9 Arizona Unfair Claim Practices act ARS 20-461 and ARS 20-462 in the following ways:
10

- 11 A. Failing to give equal consideration to Crane.
- 12 B. Failing to protect Crane.
- 13 C. Denying the claim without a reasonable basis.
- 14 D. Failing to comply with the terms, conditions and exclusions of the policy.
- 15 E. Failing to comply with Arizona law.
- 16 F. Failing to conduct a prompt and adequate investigation of claims arising
17 under an insurance policy.
- 18 G. Failing to defend and indemnify Crane.
- 19 H. Taking an unreasonable coverage position.
- 20 I. Not attempting in good faith to effectuate a prompt, fair and equitable
21 settlement of claims in which liability had become reasonably clear and
22 the damages exceed the policy limits available.
- 23 J. Failing to accept the policy limits demand.
- 24 K. Collecting a premium without providing coverage.
- 25 L. Attempting to stop its insured from protecting himself.
- 26


1 77. Because this action arises out of contract, Plaintiffs are entitled to an award of
2 attorneys' fees and costs pursuant to A.R.S. § 12-341.01

3 WHEREFORE, Plaintiffs seek judgment in their favor for damages including:
4

- 5 1. The amount of all judgments entered against Crane.
- 6 2. Benefits owed under the policy.
- 7 4. Reasonably foreseeable consequential damages from the breach.
- 8 5. Prejudgment interest under ARS §20-462.
- 9 6. Post-Judgment interest under §12-347.
- 10 7. Punitive damages in an amount sufficient to punish Electric.
- 11 8. Attorney's fees and taxable litigation costs.

12
13 DATED this 23rd day of February, 2017.

14 **LEWIS LAW FIRM, PLC**

15
16 By: 
17 Robert K. Lewis
18 Christopher A. Treadway
19 Attorneys for Plaintiffs

20 In association with:

21 **POKORA LAW, PLC**

22 Amy M. Pokora
23 Attorneys for Plaintiffs
24
25
26

Exhibit B

FILED
 2/26/15 10:20am
 MICHAEL R. JEANES, Clerk
 By D. Harding
 D. Harding Deputy

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 Christopher A. Treadway, State Bar No. 024171
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In association with:

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Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

JESSICA GAUDET, HEIDI GAUDET and
 MELISSA GAUDET, individually, as
 surviving beneficiaries of Bruce Gaudet,

Plaintiffs,

vs.

MICHAEL LEE CRANE and JANE DOE;
 CRANE, husband and wife; JOHN DOES I-
 X; JANE DOES I-X; fictitious individuals;
 ABC CORPORATIONS I-X; XYZ;
 PARTNERSHIPS, SOLE;
 PROPRIETORSHIPS and/or JOINT;
 VENTURES, I-X, fictitious entities

Defendants

NO. CV2013-002533

DEFAULT JUDGMENT

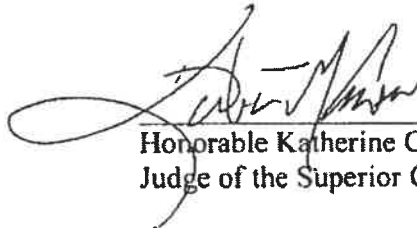
(Assigned to the Honorable Katherine
 Cooper)

1 The Court, having reviewed and considered Plaintiffs' Motion for Entry of Default
 2 Judgment Against Defendant Michael Lee Crane and having found that Defendant Michael Lee
 3 Crane did not file an Answer or other responsive pleading, and good cause appearing therefore,
 4 hereby enters DEFAULT JUDGMENT against Defendant Michael Lee Crane as follows

5 IT IS ORDERED THAT:

- 6
- 7 1. Default Judgment is entered in favor of Plaintiff Heidi Gaudet and against Defendant
 - 8 Michael Lee Crane in the amount of \$10,000,000.00.
 - 9 2. Default Judgment is entered in favor of Plaintiffs Jessica Gaudet, Heidi Gaudet and
 - 10 Melissa Gaudet, and against Defendant Michael Lee Crane for taxable costs in the
 - 11 amount of \$191.66.

12 DATED this 25th day of February, 2015.
Unofficial Document

13
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 16 
 17 Honorable Katherine Cooper
 18 Judge of the Superior Court

19
 20
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 22
 23 The foregoing instrument is a full, true and correct copy of
 24 the original on file in this office.

25 Attest September 28 20 15
 26 MICHAEL K. JEANES, Clerk of the Superior Court of the
 State of Arizona, in and for the County of Maricopa.

By M. Percy Deputy

Unofficial 20 Document

07:
ra

When recorded, please sent to:

Lewis and Pokora,
2302 N 3rd Street
Phoenix, Arizona 85004

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CAPTION HEADING:

Default Judgment

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Exhibit C

FILED
2/26/15 10:20am
MICHAEL K. JEANES, Clerk
By D. Harding
D. Harding Deputy

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9 ctreadway@lewislawfirmplc.com
10 *Attorneys for Plaintiffs*

11 **In association with:**

12 Amy M. Pokora, State Bar No. 027201
13 **POKORA LAW, PLC**
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15 Phoenix, AZ 85016
16 Phone: (602) 889-6666
17 Fax: (602) 889-6681
18 amy@ucalllaw.com
19 *Attorney for Plaintiffs*

20 **SUPERIOR COURT OF THE STATE OF ARIZONA**
21 **COUNTY OF MARICOPA**

22 JESSICA GAUDET, HEIDI GAUDET and
23 MELISSA GAUDET, individually, as
24 surviving beneficiaries of Bruce Gaudet,

25 Plaintiffs,

26 vs.

27 MICHAEL LEE CRANE and JANE DOE;
28 CRANE, husband and wife; JOHN DOES I-
29 X; JANE DOES I-X; fictitious individuals;
30 ABC CORPORATIONS I-X; XYZ;
31 PARTNERSHIPS, SOLE;
32 PROPRIETORSHIPS and/or JOINT;
33 VENTURES, I-X, fictitious entities

34 Defendants

NO. CV2013-002533

DEFAULT JUDGMENT

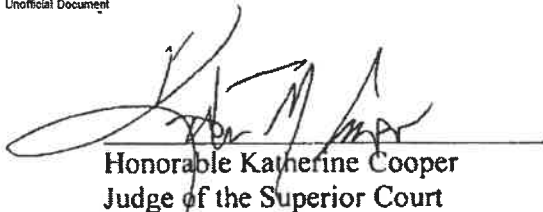
(Assigned to the Honorable Katherine
Cooper)

1 The Court, having reviewed and considered Plaintiffs' Motion for Entry of Default
2 Judgment Against Defendant Michael Lee Crane and having found that Defendant Michael Lee
3 Crane did not file an Answer or other responsive pleading, and good cause appearing therefore,
4 hereby enters DEFAULT JUDGMENT against Defendant Michael Lee Crane as follows

5 IT IS ORDERED THAT:

- 6
- 7 1. Default Judgment is entered in favor of Plaintiff Melissa Gaudet and against
8 Defendant Michael Lee Crane in the amount of \$10,000,000.00.
 - 9 2. Default Judgment is entered in favor of Plaintiff's Jessica Gaudet, Heidi Gaudet and
10 Melissa Gaudet, and against Defendant Michael Lee Crane for taxable costs in the
11 amount of \$191.68.

12 DATED this 25th day of February, 2015.
13 Unofficial Document

14 
15
16 Honorable Katherine Cooper
17 Judge of the Superior Court
18
19
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21
22

23 The foregoing instrument is a full, true and correct copy of
24 the original on file in this office.

25 Attest September 28 20 15
MICHAEL K. JEANES, Clerk of the Superior Court of the
26 State of Arizona, in and for the County of Maricopa.

By M. Percy Deputy

Unofficial
20 Document

07:
ra

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Phoenix, Arizona 85004

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Default Judgment

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Exhibit D

FILED
 2/26/15 10:20am
 MICHAEL K. JEANES, Clerk
 By D. Harding
 D. Harding Deputy

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Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF ARIZONA
COUNTY OF MARICOPA

JESSICA GAUDET, HEIDI GAUDET and
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 surviving beneficiaries of Bruce Gaudet,

Plaintiffs,

vs.

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 CRANE, husband and wife; JOHN DOES I-
 X; JANE DOES I-X; fictitious individuals;
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Defendants

NO. CV2013-002533

DEFAULT JUDGMENT

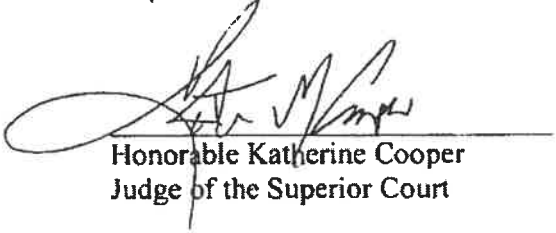
(Assigned to the Honorable Katherine
 Cooper)

1 The Court, having reviewed and considered Plaintiffs' Motion for Entry of Default
2 Judgment Against Defendant Michael Lee Crane and having found that Defendant Michael Lee
3 Crane did not file an Answer or other responsive pleading, and good cause appearing therefore,
4 hereby enters DEFAULT JUDGMENT against Defendant Michael Lee Crane as follows

5 IT IS ORDERED THAT:

- 6 1. Default Judgment is entered in favor of Plaintiff Jessica Gaudet and against
7 Defendant Michael Lee Crane in the amount of \$10,000,000.00.
8 2. Default Judgment is entered in favor of Plaintiffs Jessica Gaudet, Heidi Gaudet and
9 Melissa Gaudet, and against Defendant Michael Lee Crane for taxable costs in the
10 amount of \$191.66.
11

12 DATED this 25th day of February, 2015.
13 Unofficial Document

14 
15
16 Honorable Katherine Cooper
17 Judge of the Superior Court
18
19
20
21
22
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25
26

The foregoing instrument is a full, true and correct copy of
the original on file in this office.

Attest September 28 20 15
MICHAEL K. JEANES, Clerk of the Superior Court of the
State of Arizona, in and for the County of Maricopa.

By M Piercy Deputy

Unofficial
20: Document

07:
ra

When recorded, please sent to:

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Phoenix, Arizona 85004

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CAPTION HEADING:

Default Judgment

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Exhibit E

ORIGINAL

MAY 22 2017

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Attorney for Plaintiffs

SUPERIOR COURT OF ARIZONA

COUNTY OF MARICOPA

JESSICA GAUDET, HEIDI GAUDET and
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Plaintiffs,

vs.

ELECTRIC INSURANCE COMPANY, a
Massachusetts company; JOHN and JANE
DOES I through X, fictitious individuals;
ABC CORPORATIONS I-X, MUNICIPAL
CORPORATIONS I-X; XYZ
PARTNERSHIPS, SOLE
PROPRIETORSHIPS and/or JOINT
VENTURES I-X, fictitious entities,

Defendants.

Case No.

CV 2017-000283

STATE OF ARIZONA
DEPT. OF INSURANCE

SUMMONS

MAY 16 2017

TIME 2:50 PM
SERVICE OF PROCESS

If you would like to dispute this Court's jurisdiction,
you must file a motion to dismiss this case within 30 days of the date of service of this summons.

FILED IN MARICOPA COUNTY

WITNESSED BY ME, CLERK OF THE COURT,

on this 16th day of May, 2017.

Maricopa County Superior Court

THE STATE OF ARIZONA TO: ELECTRIC INSURANCE COMPANY

YOU ARE HEREBY SUMMONED and required to appear and defend, within the time applicable in this action in this Court. If served within Arizona, you shall appear and defend within 20 days after the service of the Summons and Complaint upon you, exclusive of the day of service. If served out of the State of Arizona – whether by direct service, by registered or certified mail, or by publication – you shall appear and defend within 30 days after the service

1 of the Summons and Complaint upon you is complete, exclusive of the day of service. Where
2 process is served upon the Arizona Director of Insurance as an insurer's attorney to receive
3 service of legal process against it in this state, the insurer shall not be required to appear,
4 answer or plead until expiration of 40 days after date of such service upon the Director.
5 Service by registered or certified mail without the State of Arizona is complete 30 days after
6 the date of filing the receipt and affidavit of service with the Court. Service by publication is
7 complete 30 days after the date of the first publication. Direct service is complete when made.
8 Service upon the Arizona Motor Vehicle Superintendent is complete 30 days after filing the
9 Affidavit of Compliance and return receipt or Officer's Return.

10
11 YOU ARE HEREBY NOTIFIED that in case of your failure to appear and defend
12 within the time applicable, judgment by default may be rendered against you for the relief
13 demanded in the Complaint.

14
15 YOU ARE CAUTIONED that in order to appear and defend, you must file an Answer
16 or proper response in writing with the Clerk of this Court, accompanied by the necessary filing
17 fee, within the time required, and you are required to serve a copy of any Answer or response
18 upon the Plaintiffs' attorney. RCP 10(d); ARS § 12-311; RCP 5.

19
20 The names and address of Plaintiff's attorneys are:

21
22 Robert K. Lewis
23 Christopher A. Treadway
24 Lewis Law Firm, P.L.C.
25 2302 N 3rd Street
26 Phoenix, Arizona 85004

and

Amy M. Pokora
2302 N 3rd Street
Phoenix, Arizona 85004

1 SIGNED AND SEALED this Date: FEB 23 2017

2 MICHAEL K. JEANES, CLERK

3 Clerk

4 By

5 Deputy Clerk.
6 A. Valenzuela
7 Deputy Clerk



Exhibit F

7/2/17



ARIZONA DEPARTMENT OF INSURANCE
2910 North 44th Street, Suite 210
Phoenix, Arizona 85018-7269

REGISTERED MAIL



7017 0530 0000 3037 8747



MAY 2 2 2017

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LISA R. PIERCE
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BEVERLY, MA 01915
CV2017-000283



Exhibit G

COPY

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10 *Attorneys for Plaintiffs*

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17 amy@lewisandpokora.com
18 *Attorney for Plaintiffs*

FEB 28 2017
MICHELLE K. JEANES, CLERK
A. VALLINQUELA
DEPUTY CLERK

7 **SUPERIOR COURT OF ARIZONA**

8 **COUNTY OF MARICOPA**

9 JESSICA GAUDET, HEIDI GAUDET and
10 MELISSA GAUDET, individually, as
11 surviving beneficiaries of Bruce Gaudet,

12 **Plaintiffs,**

13 **vs.**

14 ELECTRIC INSURANCE COMPANY, a
15 Massachusetts company; JOHN and JANE
16 DOES I through X, fictitious individuals;
17 ABC CORPORATIONS I-X, MUNICIPAL
18 CORPORATIONS I-X; XYZ
19 PARTNERSHIPS, SOLE
20 PROPRIETORSHIPS and/or JOINT
21 VENTURES I-X, fictitious entities,

22 **Defendants.**

Case No. **CV 2017-000283**

DEMAND FOR JURY

23 Plaintiffs, by and through undersigned counsel, hereby request a trial by jury on all
24 issues in the above-captioned matter

25 DATED this 23rd day of February, 2017.

26 **LEWIS LAW FIRM, PLC**

By: _____

Robert K. Lewis
Christopher A. Treadway
Attorneys for Plaintiffs

In association with:

POKORA LAW, PLC

Amy M. Pokora
Attorneys for Plaintiffs

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Exhibit H

COPY

FEB 23 2017



MICHAEL K. JEANES, CLERK
A VALENZUELA
DEPUTY CLERK

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Attorney for Plaintiffs

SUPERIOR COURT OF ARIZONA

COUNTY OF MARICOPA

CV 2017-000283

JESSICA GAUDET, HEIDI GAUDET and
MELISSA GAUDET, individually, as
surviving beneficiaries of Bruce Gaudet,

Case No.

Plaintiffs,

CERTIFICATE OF ARBITRATION

vs.

ELECTRIC INSURANCE COMPANY, a
Massachusetts company; JOHN and JANE
DOES I through X, fictitious individuals;
ABC CORPORATIONS I-X, MUNICIPAL
CORPORATIONS I-X; XYZ
PARTNERSHIPS, SOLE
PROPRIETORSHIPS and/or JOINT
VENTURES I-X, fictitious entities,

Defendants.

Plaintiffs, by and through counsel undersigned, and pursuant to Rule 72(e),
Ariz.R.Civ.P., certify that they know the dollar limits and any other limitations set forth by the
local rules of practice for the Maricopa County Superior Court and this case IS NOT subject to
Compulsory Arbitration.